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May 30, 1991

RECEIVED

JUN 05 1991

RCOM SECTION

VIA HAND DELIVERY

David A. Hoefer, Esq.
Assistant Regional Counsel
U.S.E.P.A., Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Steelcote Manufacturing Company

Dear David:

Enclosed please find a copy of the Uniform Hazardous Waste Manifest under which the drums in the tin shed at Steelcote's facility were shipped to a TSD facility. Also enclosed is a copy of the generator notification to the TSD facility regarding shipments of waste restricted from land disposal. Finally, I enclose a copy of the bill of lading for the shipment.

A word of explanation about the manifest. As you can see, the shipment of 77 drums was divided into three groups. The first group, consisting of one drum, represents still bottoms from the distillation unit. This waste, of course, is not connected with the tin shed.

The second and third groups are both connected with the tin shed. The second group, consisting of 40 drums, represents the drums of material from the tin shed that consisted mostly of liquid. The third group, consisting of 36 drums, represents the drums that consisted of mostly solid and semi-solid materials.

With this shipment, all of the materials previously stored in the tin shed, except for raw materials, have been shipped off-site.

Finally, Steelcote expects to receive a proposal from its consultant today, May 30, describing testing that the consultant



R00353107

RCRA RECORDS CENTER

David A. Hoefer, Esq.
May 30, 1991
Page Two

would conduct. I will contact you further regarding this in the near future.

Please feel free to contact me if you have any questions.

Very truly yours,

Al McMahon

Alphonse McMahon

AM/bkw
Enclosures

cc: Doug Niedt (w/o encs. via U.S. Mail)
Jim Moore (w/o encs. via U.S. Mail)



PLEASE PRINT OR TYPE

Form designed for use on elite (12-pitch) typewriter.

Form Approved OMB No. 2050-0039 Expires 9-30-91

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1

Information in the shaded areas is
not required by Federal law, but
items D, F, H and I are required by
State law.

M O D 0 0 6 2 7 5 0 3 6 0 0 0 2 7

3. Generator's Name and Mailing Address

STEELCOTE MANUFACTURING COMPANY
ONE STEELCOTE SQUARE ST. LOUIS, MO 63103-2990

A. State Manifest Document Number

INA 0551360

4. Generator's Phone (314) 771-8053

B. State Generator's ID

001157

5. Transporter 1 Company Name

6. Use EPA ID Number

C. State Transporter's ID

DAHLEEN TRANSPORT INCORPORATED M N D 0 2 2 9 6 9 0 2 6

D. Transporter's Phone 612-459-9758

7. Transporter 2 Company Name

8. Use EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

AVGANICS INCORPORATED
1330 ROCKPORT
TERRE HAUTE, IN 47802

10. Use EPA ID Number

G. State Facility's ID

RRIN12

H. Facility's Phone

I N D 9 8 4 8 6 6 5 4 1 812-232-5411

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13.
Total
Quantity

14.
Unit
Wt/Vol.

I.
Waste No.

a. FLAMMABLE LIQUID RQ, WASTE FLAMMABLE
LIQUID N.O.S. CONTAINS XYLENE AND MINERAL
SPIRITS. UN# 1993 (GD 27)

01

1 40 M

55

990 G

F003/

b. FLAMMABLE LIQUID RQ, WASTE FLAMMABLE
LIQUID N.O.S. CONTAINS XYLENE AND METHYL
ETHYL KETONE. UN# 1993 (GD 27)

40

38 D M

2200

2090 G

F005/D008

c. FLAMMABLE LIQUID RQ, WASTE FLAMMABLE
LIQUID N.O.S. CONTAINS XYLENE AND METHYL
ETHYL KETONE. UN# 1993 (GD 27)

36

D M

1980

G

F005/D008

J. Additional Descriptions for Materials Listed Above

ITEMS IN a., b., and c. are multi-coded.
AUTHORIZATION NUMBERS a. 12527-R-1821
b. 16825-R-1820 c. 16647-R-1819

K. Handling Codes for Wastes Listed Above

T-50

15. Special Handling Instructions and Additional Information

IF UNDELIVERABLE, RETURN TO GENERATOR. IN EVENT OF FIRE, SPILL OR
OTHER EMERGENCY IT MAY BE NECESSARY TO CALL NRC AT 1-800-424-8802.
CALL CHEMTREC AT 1-800-424-9300 FOREMERGENCY RESPONSE.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have
determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me
which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith
effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

JAMES S. MOORE

Signature

James S. Moore

Date

Month Day Year
0 5 2 4 9 1

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

DAVID A. WHITE

Signature

David A. White

Date

Month Day Year
0 5 2 4 9 1

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

#A THE SOLVENT WASTE CONSTITUENTS MARKED ABOVE DO NOT MEET THE TREATMENT STANDARD AND CANNOT BE LAND DISPOSED.

CARRIER **DAHLEEN TRANSPORT INCORPORATED** CARRIER'S NO. **FROM STEELCOTE MANUFACTURING CO.**
 AT ST. LOUIS, MO. 63103 **MAY 24, 1991** 19

DESTINATION **AVGANICS INCORPORATED**
 & **1330 Rockport**
 DELIVERY **TERRE Haute, IN 47802**
 ADDRESS

PURCHASE ORDER NUMBER

SPECIAL INSTRUCTIONS

24 HOUR EMERGENCY RESPONSE CHEMTREC 1-800-424-9300
SEE MANIFEST FOR OTHER INSTRUCTIONS

NO. PKGS.	H/M	PACKAGE DESCRIPTION, SHIPPING NAME -- (D.O.T. I.D.)	CLASS	WEIGHT	RECEIVED, subject to the classification and tariffs in effect on the date of the issue of the Bill of Lading.
		BOXES, PAINT, FLAMMABLE LIQUID UN 1263	55		<p>the property described below in apparent good order except as noted (contents and condition of contents of packages unless marked, consigned, and delivered as indicated below which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination if on its route otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Freight Bill of Lading set forth in the Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.</p> <p>Shopper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.</p> <p>Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:</p> <p>The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.</p>
		PAILS, PAINT, FLAMMABLE LIQUID UN 1263	55		
		DRUMS, PAINT, FLAMMABLE LIQUID UN 1263	55		
		BOXES, SOLVENT, N.O.S., FLAMMABLE LIQUID NA 1993	55		
5577		DRUMS, SOLVENT, N.O.S., FLAMMABLE LIQUID NA 1993	55	38,000	
		BOXES, COMPOUND, CLEANING LIQUID, (MURIATIC ACID) CORROSIVE MATERIAL NA 1789	55		
		BOXES, COMPOUND, CLEANING LIQUID, (PHOSPHORIC ACID) CORROSIVE MATERIAL NA 1760	55		
		BOXES, COMPOUND, PAINT OR VARNISH REMOVING LIQUID, CORROSIVE MATERIAL NA 1760	55		
		BOXES, PAINT, COMBUSTIBLE LIQUID UN 1263	55		
		PAILS, PAINT, COMBUSTIBLE LIQUID UN 1263	55		
		DRUMS, PAINT, COMBUSTIBLE LIQUID UN 1263	55		<p>(Signature of consignor.)</p> <p>If charges are to be prepaid write or stamp here. "To be Prepaid."</p> <p>Rec'd \$ 10</p> <p>apply in prepayment of the charges on the property described herein.</p> <p>Agent or Cashier</p> <p>Per</p> <p>(The signature here acknowledges only the amount prepaid.)</p> <p>Charges advanced:</p>
		BOXES, SOLVENT, N.O.S., COMBUSTIBLE LIQUID NA 1993	55		
		PAILS, SOLVENT, N.O.S., COMBUSTIBLE LIQUID NA 1993	55		
		BOXES, COMPOUND, LACQUER, PAINT, OR VARNISH REMOVING, REDUCING OR THINNING LIQUID, FLAMMABLE LIQUID NA 1142	55		
		PAILS, COMPOUND, LACQUER, PAINT, OR VARNISH, REMOVING, REDUCING OR THINNING LIQUID, FLAMMABLE LIQUID NA 1142	55		
		BAGS, SAND, N.O.I. ITEM 90220	50		
		BAGS, CEMENT, BONDING ITEM 41950	55		<p>THE FIBRE BOXES USED FOR THIS SHIPMENT CONFORM TO THE SPECIFICATIONS SET FORTH IN THE BOX MAKER'S CERTIFICATE THEREOF, AND ALL OTHER REQUIREMENTS OF CONSOLIDATED FREIGHT CLASSIFICATION</p>
		BOXES, HAND TOOLS N.O.I.	70		
		BOXES, ADVERTISING MATERIAL ITEM 4860 SUB 2	77 1/2		
7777		← TOTAL NO. OF PKGS. TOTAL WEIGHT →		38,000 ⁵	

PERMANENT POST OFFICE ADDRESS OF SHIPPER:

STEELCOTE MFG. CO.
3418 GRATIOT ST. ST. LOUIS, MO. 63103

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation.

"If the shipment moves between two parts by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."
 NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
 The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$100,000.

"Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission"

THE FIBRE BOXES USED FOR THIS SHIPMENT CONFORM TO THE SPECIFICATIONS SET FORTH IN THE BOX MAKER'S CERTIFICATE THEREOF, AND ALL OTHER REQUIREMENTS OF CONSOLIDATED FREIGHT CLASSIFICATION

SHIPPER, PER

AGENT, PER

Mark with "X" to designate Hazardous Materials as defined in the Department of Transportation Regulations Governing Transportation of Hazardous Materials. The use of this column is an optional method of designating hazardous materials on bills of lading per Section 172.201 and 172.202(b) of the regulations governing the transportation of such materials.